

ISSUANCE DATE: 11/25/2022



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Interfor U.S. Inc. – Eatonton Sawmill
Facility Address: 370 Dennis Station Road SW
Eatonton, Georgia 31024 (Putnam County)
Mailing Address: 370 Dennis Station Road SW
Eatonton, Georgia 31024

Parent/Holding Company: Interfor U.S. Inc.

Facility AIRS Number: 04-13-237-00010

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The construction and installation of a 40 MMBtu/hr direct-fired continuous lumber drying kiln (ID No. DK04), a sawdust fuel bin (ID No. BN02), and a cyclone (ID No. CY08), and the replacement of the existing venturi scrubber (ID No. VS01).

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-237-0010-V-04-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28444 dated June 1, 2022; Application No. 671705 dated June 17, 2022; any other applications upon which this Amendment or Permit No. 2421-237-0010-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 9 pages.



Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

Interfor U.S. Inc. – Eatonton Sawmill (hereinafter “facility”) submitted Application No. 28444 on June 1, 2022, and Application No. 671705 on June 17, 2022 for the construction and installation of a direct-fired continuous lumber drying kiln (ID No. DK04) with a 40 MMBtu/hr green sawdust-fired burner. The modification will also include the addition of a cyclone (ID No. CY08) and a sawdust fuel bin (ID No. BN02) to collect sawdust and feed the burner. Continuous Drying Kiln DK04 will have a design capacity of 120 MMBF/yr. The facility will also be replacing the existing venturi scrubber (ID No. VS01) with an identical unit.

All other existing equipment at the facility will remain unmodified. The installation of the proposed kiln will result in an increase in the facility’s throughput, but the existing sawmill (ID No. SM01) and planer mill (ID No. PM01) will be able to withstand the increase and require no modification.

The proposed modification will result in an increase in volatile organic compounds (VOC) above the Prevention of Significant Deterioration (PSD) significant emission rate (SER), thereby triggering a PSD review. All other pollutant increases as a result of the modification are below their respective SER and do not require PSD review.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
PB01	Waste Wood Power Boiler (74.46 MMBtu/hr)	391-3-1-.02(2)(d) 391-3-1-.02(2)(g)2. 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD	MT01 VS01	Multiclone Venturi Scrubber
DK01	Batch Drying Kiln, indirect steam heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD	N/A	None
DK02	Batch Drying Kiln, indirect steam heated	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD	N/A	None
DK03	Continuous Drying Kiln, wood fired	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2. 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD	N/A	None
DK04	Continuous Drying Kiln 4 Direct Fired Fuel: Wood Burner Capacity: 40 MMBtu/hr	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)2. 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD	N/A	N/A
PM01	Planer Mill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	CY06	Cyclone
SM01	Sawmill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	N/A	None
BN01	Sawdust Fuel Bin for DK03	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	CY07	Cyclone
BN02	Sawdust Fuel Bin for DK04	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	CY08	Cyclone

*New emission units are in bold

3.2 Equipment Emission Caps and Operating Limits

Modified Conditions:

3.2.1 The Permittee shall not process more than 120 million board feet (MMbf) of lumber in the batch drying kilns (ID Nos. DK01 and DK02), combined, during any twelve consecutive months.
[VOC PSD Avoidance – 40 CFR 52.21]

3.2.2 The Permittee shall not process more than 120 MMbf of lumber in the continuous drying kiln (ID No. DK03), during any twelve consecutive months.
[VOC PSD Avoidance – 40 CFR 52.21]

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New Conditions:

- 3.2.3 The Permittee shall not process more than 120 MMbf of lumber in the continuous drying kiln (ID No. DK04), during any twelve consecutive months.
[40 CFR 52.21]
- 3.2.4 The Permittee shall construct and operate the continuous drying kiln (ID No. DK04), fuel bin (ID No. BN02), and cyclone (ID No. CY08) in accordance with the application(s) submitted. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.
[391-3-1-.02(7)(b)15. And 40 CFR 52.21(r)(1)]
- 3.2.5 Approval to construct the continuous drying kiln (ID No. DK04), fuel bin (ID No. BN02) and cyclone (ID No. CY08) shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date. For purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9).
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(2)]
- 3.2.6 Within 180 days of the initial startup of the continuous drying Kiln (ID No. DK04), the Permittee shall develop and implement a Site-Specific Kiln Emissions Management Plan (KEMP); identifying general work practice standards to minimize emissions. The program shall be subject to review and modification by the Division. All operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs. With future equipment changes or modifications, the site-specific KEMP may be modified.
[391-3-1-.02(7)(b)7. and 40 CFR 52.21(j)(3)]
- 3.2.7 The Permittee shall operate the air pollution control devices for the sawmill (ID No. SM01), planer mill (ID No. PM01), and fuel bin (ID No. BN02) at all times during the operation of the associated emission units.
[PM/PM10/PM2.5 PSD Avoidance – 40 CFR 52.21]
- 3.2.8 The Permittee shall not fire any fuel other than wood in the continuous drying kiln (ID No. DK04).
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 3.2.9 The Permittee shall operate the power vents at all times when the continuous drying kiln (ID No. DK04) are in operation.
[Georgia Air Toxics Guidelines]

3.3 Equipment Federal Rule Standards

Modified Condition:

- 3.3.1 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” for operation of the Lumber Drying Kilns (ID Nos. DK01, DK02, DK03, and DK04).
[40 CFR 63 Subpart A and Subpart DDDD]

3.4 Equipment SIP Rule Standards

Modified Conditions:

- 3.4.4 The Permittee shall not cause, let, suffer, permit, or allow the emission from equipment subject to GA Rule (e), which contains particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)1.(i)]

a. $E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

b. $E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;

P = process input weight rate in tons per hour.

- 3.4.5 The Permittee shall not cause, let, suffer, permit, or allow any emissions from equipment subject to GA Rule (b), which exhibit visible emissions, the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements**

Modified Conditions:

4.2.1 The Permittee shall conduct an initial particulate matter (PM) test on the Waste Wood Power Boiler (ID No. PB01) by January 9, 2023. The Permittee shall then repeat the PM testing at 12-month intervals. Should the PM emissions from the boiler be (50) percent or less of the applicable emissions limitation contained in Condition 3.4.1, the Permittee may request that testing be conducted at 24-month intervals until such time that an emissions test indicates an emissions rate greater than 50 percent of the applicable emission limitation at which time testing shall revert to a 12-month interval.
[391-3-1-.02(6)(b)1.(i)]

4.2.5 By January 9, 2023, the Permittee shall conduct the following performance tests on the Wood Waste Power Boiler (ID No. PB01) to demonstrate compliance with the emission limits specified in Conditions 3.3.4a. through d. The Permittee shall conduct subsequent performance testing according to the schedule specified in Condition 4.2.6:
[391-3-1-.02(6)(b)1.; 40 CFR 63.7505(c); 40 CFR 63.7520(a); Items 1 and 13 of Table 2 to 40 CFR 63 Subpart DDDDD; and 40 CFR 70.6(a)(3)(i)]

- a. A performance test for HCl. Samples must be collected at a minimum of 1 dry standard cubic meter (dscm) per run for Method 26A or at a minimum of 120 liters per run for Method 26.
- b. A performance test for Hg. Samples must be collected at a minimum of 3 dscm per run for Method 29 or at a minimum sample as specified in Method 30A or Method 30B.
- c. A performance test for CO.
- d. A performance test for PM (or TSM). Samples must be collected at a minimum of 1 dscm per run.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

Modified Condition:

5.2.2 The Permittee shall perform the following applicable operation and maintenance checks on Multiclone MT01, Cyclone CY06, Cyclone CY07, and Cyclone CY08 and retain a record suitable for inspection or submittal. The checks shall be conducted for each week or portion of each week of operation of the applicable equipment. A checklist or other similar log may be used for this purpose:

[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

- a. Check exterior of the units for holes in the body or evidence of malfunction in interior of the multiclone or cyclones.
- b. Check hopper for bridging and plugging.
- c. Check particulate transfer device for proper operation to ensure dust removal.

Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any twelve consecutive month period for which the total amount of lumber dried in the batch drying kilns (ID Nos. DK01 and DK02), combined, exceeds 120 million board feet.
- ii. Any twelve consecutive month period for which the total amount of lumber dried in the continuous drying kiln (ID No. DK03), exceeds 120 million board feet.
- iii. Any twelve consecutive month period for which the total amount of lumber dried in the continuous drying kiln (ID No. DK04) exceeds 120 million board feet.
- iv. Any time the control devices specified in Condition 3.2.7 were not operated in accordance with the requirements specified in Condition 3.2.7.
- v. Any time that the fuel burned in the continuous drying kiln (ID No. DK04) does not meet the requirements specified in Condition 3.2.8.

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. For Scrubber VS01, any three-hour period for which the average scrubber pressure drop is less than or equal to 90 percent of the value established as required by Condition 4.2.3. For the purpose of this condition, each clock hour begins a new 3-hour period.

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- ii. For Scrubber VS01, any three-hour period for which the average scrubbant flow rate is outside the range of 80 to 120 percent of the average value established as required by Condition 4.2.3. For the purpose of this condition, each clock hour begins a new 3-hour period.
- iii. Any adverse condition(s) discovered during the weekly inspections of the multiclone (MT01), the planer mill cyclone (CY06), and the sawdust fuel bin cyclones (CY07 and CY08).
- iv. Any time continuous drying kilns' (DK03 and DK04) power vents are not operated when the associate kiln is in operation.
- v. Upon the completion of the performance testing specified in Condition 4.2.9, any 30-day rolling average pressure drop across VS01 that is below the minimum pressure drop measured during the performance test.
[40 CFR 63.7540(a)1. and (b), Item 1 of Table 4 of 40 CFR 63 Subpart DDDDD and Item 4 of Table 8 of 40 CFR Subpart DDDDD]
- vi. Upon the completion of the performance testing specified in Condition 4.2.9, any 30-day rolling average flow rate through VS01 that is below the minimum flow rate measured during the performance test.
[40 CFR 63.7540(a)1. and (b), Item 1 of Table 4 of 40 CFR 63 Subpart DDDDD and Item 4 of Table 8 of 40 CFR Subpart DDDDD]
- vii. Upon the completion of the performance testing specified in Condition 4.2.9, any 30-day rolling average oxygen content from PB01 that is below the lowest hourly average oxygen content measured during the performance test.
[40 CFR 63.7540(a)1. and (b), Item 8 of Table 4 of 40 CFR 63 Subpart DDDDD and Item 9 of Table 8 of 40 CFR Subpart DDDDD]
- viii. Upon completion of the performance testing specified in Condition 4.2.9, any 30-day rolling average steam generation rate from PB01 that exceeds 110 percent of the highest hourly average steam generation rate measured during the performance test.
[40 CFR 63.7540(a)1. and (b), Item 7 of Table 4 of 40 CFR 63 Subpart DDDDD and Item 10.c of Table 8 of 40 CFR Subpart DDDDD]

6.2 Specific Record Keeping and Reporting Requirements

Modified Conditions:

6.2.3 The Permittee shall furnish the Division written notification as follows:
[391-3-1-.02(6)(b)1.; 40 CFR 63.2280(b); and 40 CFR 70.6(a)(3)(i)]

- a. The actual dates of initial startup of the continuous drying kiln (ID No. DK04), within 15 days after such dates.

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- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.

New Conditions:

- 6.2.18 The Permittee shall maintain monthly records of the amount of the dried lumber processed through the continuous lumber drying kiln (ID No. DK04), necessary to confirm compliance with the production limit in Condition 3.2.3. The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division upon request. These records shall be retained for at least five years following the day of record.
[391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.19 The Permittee shall, each month, calculate and record the twelve-month rolling total of the board feet of lumber dried in the continuous lumber drying kiln (ID No. DK04) using the monthly records required in Condition No. 6.2.18. A twelve-month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months.
[391-3-1-.02(6)(b)1.(i) and 40 CFR 70.6(a)(3)(i)]